

APPENDIX D
RESPONSE TO COMMENTS
Greasy Creek Environmental Assessment
Cherokee National Forest
Ocoee/Hiwassee Ranger District

The 30-day comment period for Greasy Creek was initiated May 21, 2009 with a letter mailed to all those that had expressed interest (2 individuals). A legal notice was published in the Polk County News on May 27, 2009 stating the analysis was available for public review. The Environmental Assessment was posted on the Cherokee National Forest website. One response was received as indicated below.

COMMENTS #	COMMENTS NAME	DATE POSTMARKED	DATE RECEIVED
1	Davis Mounger	6/22/2009	6/23/2009

Page numbers in the responses refer to the EA dated May 2009. Page numbering may vary slightly on EA versions viewed or printed from the website.

The comments displayed below are excerpted from the original letter to represent the essence of the comment or concern. The complete text of the comment may be read in the original letter in the project file.

Comment: Need for a wide range of alternatives.

Response: Alternatives should be developed based on significant issues and the purpose and need for action. No significant issues were raised by the public (August 2007 scoping initiation through May 2009); hence no alternatives were developed from public comments. See page 13 of the EA and the project file for public comments received. IDT concerns are addressed in the Proposed Action; hence no further alternatives were needed.

The alternatives proposed in Mr. Mounger's comments 1) burn only 2) uneven-aged logging and 3) pine monoculture would not achieve the purpose and need of the proposed action and will not be considered in detail. There is no legal requirement to develop alternatives that do not meet the Purpose and Need of the project.

Comment: Riparian zones should be identified. The EA does not map or list the stands that contain riparian corridors. Because the EA does not identify where these corridors are, I am unable to comment effectively on this part of the EA. The district needs to clearly map these corridors so that the public can understand the EA and make relevant comments to it.

Response: Mr. Mounger contacted the district and requested information regarding riparian zones. (See project file for questions and responses.) He was directed to page 164-165 of the CNF RLRMP which states "Due to their spatial extent, riparian corridors are not identified on the revised LMP map of prescription allocations..... For project planning and implementation

the following process will be used to determine the extent of site-specific riparian corridors:....”

Table 3-3 (pg. 165) of the RLRMP indicates that 100 foot (each side of stream) corridors will be used for perennial streams and 50 foot (each side of stream) corridors for intermittent drainages if the corridor is not site specifically determined by an interdisciplinary analysis.

Mr. Mounger was also informed that “Site specific delineation of the riparian corridor will occur during implementation of the project. For planning purposes the widths in RLRMP Table 3-3 were followed, which estimated the riparian area at 21% of the project area.”

Further, Mr. Mounger found the EA on the CNF webpage (phone conversation 6/9/09). The webpage also displayed topographic maps of the proposed action, which clearly display streams within the project area.

In summary, the tools needed to determine riparian zones were available to individuals that have the project maps and are aware of the RLRMP standards. Both of these were available to Mr. Mounger and were also available to other publics, either by the CNF webpage or on request.

Comment: The EA discusses eastern hemlock in the analysis area but it is not clear as to how much hemlock is in the analysis area, where it is found, what its state of health is, and what are the plans for it. There are numerous references to threats or possible threats to hemlocks from the hemlock wooly adelgid (HWA). However, it is not clear if the HWA has affected the project area. Regardless of the status of HWA in this analysis area, healthy hemlock should be spared.

Response: Mr. Mounger requested and received CISC (FSVeg) data for all the compartments in the project area. He was directed to pg. 39 of the RLRMP to be able to interpret the forest type column. Mr. Mounger was also told in other email messages, to help him clarify the FSVeg data, that “only white pine stands are proposed for harvest”.

Page 54 of the EA explains that HWA treatments are proposed within the Greasy Creek project area. “HWA poses a serious threat to the eastern hemlock found in the analysis area. The CNF HWA Suppression EA and DN (USDA 2005b) includes one hemlock treatment area within the Greasy Creek analysis area; located near Presswood Gap. This area will be treated in the next few years using biological and chemical control methods. The site was chosen for treatment as part of a landscape level effort to maintain the presence and genetic diversity of hemlock. The treatment site was chosen in coordination with other treatment sites on the landscape so that pollen may be transferred between sites.”

Comment: The EA provides for large amount of prescribed burning in the project area. Where some of the burns would occur in more upland-pine dominant areas, there are many stands of oak and oak/pine forest type where the justification for and known historical role of a regular

fire regime is questionable. Three studies are referenced and quoted referring to the effect prescribed burning has on red oak in particular.

Response: There are no northern red oak stands that are proposed for burning. Northern red oak is most likely a component of some of the mesic stands in the project area. However, it is not the dominant forest type. As stated in the EA pg. 5 and transmitted in an email to Mr. Mounger burning in mesic areas is minimized within the constraints of meeting other prescribed fire objectives. RLRMP Objective 24.02 and Forest Wide Standards 48 and 96 further address burning in mesic forests. Therefore, the effects that are mentioned in the studies quoted are not likely to occur on any significant acreage within this site specific project area. See pages 24-27 and 57-58 of the EA for effects analysis on prescribed burning oaks in general.

Comment: One of the stated advantages for Alternative B is that it would benefit Scarlet Tanager, a MIS. A Cornell project indicates that tanagers are most commonly found in mixed hardwood/coniferous forests, and they are most commonly associated with maples. This seems to be at odds with the desired goal of Alternative B to create better Tanager habitat.

Response: The EA (pgs. 24-27) displays the direct, indirect and cumulative effects of the proposed action within the oak and oak-pine communities of which Scarlet Tanager is a Management Indicator Species. (RLRMP pgs. 28-29) While maples are a large component of many stands, there is no indication they are preferred for nesting as is the case with oaks (NatureServe. 2009. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <http://www.natureserve.org/explorer>. (Accessed: May 24, 2010). The regeneration of oaks or a stand with a large oak component would be beneficial to tanagers in this case. Maples would still likely be a part of the regenerated stand as well.

Comment: The EA does address the presence of old growth (EA, pg 68). However, one stand in the proposed timber sale is over 100 years old and a couple of others are 90 years old. At [a] minimum, these should be considered as a part of restoration of old-growth stands.

Response: During analysis of the Greasy Creek Project no stands were found that met the criteria for old growth. Additionally, none of the stands proposed for harvest meet old growth criteria (EA pg. 60). This analysis meets Objective 16.01 “Map patches, as discovered, of old growth identified during stand examination.” None were discovered. It also meets Forestwide Standard FW-46, “Identify Old Growth Patches during project planning using criteria outlined in Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forest Communities on National Forests in the Southern Region.” No old growth patches were found.

The Purpose and Need of this project (EA pgs. 3-7) does not include delineating Future Old Growth. However, none of the activities proposed in the Greasy Creek Project preclude doing this. “Future Old Growth is non-technically defined as any prescription with management direction that features little or no timber harvesting” (FEIS, pg. 185). In Appendix D (pg. 328) of the RLRMP, “Examples of future old growth include allocations of wilderness and

backcountry management prescriptions. Included in this category of future old growth are riparian areas and other unsuitable lands.”

Comment: Need for a clear, site specific analysis. The EA needs to contain more site specific information for effective public comment. Such information would greatly improve the public’s ability to make informed comments on this project.

Response: See pages 16-84 of the EA for site specific direct, indirect and cumulative effects of the proposed action. The project file, Division C, contains supporting information for the effects analysis displayed in the EA.

The Forest Service provided this EA for comment under 36 CFR 215.1 which states: “First, this part establishes a process by which the public receives notice and is provided an opportunity to comments on **proposed actions** [emphasis added] for projects and activities implementing a land and resource management plan prior to a decision by the Responsible Official.” 36 CFR 215.2 provides the definition of proposed action: “A proposal made by the Forest Service that is a project or activity implementing a land and resource management plan on National Forest System lands and is subject to the notice and comment provisions of this part. “ Further 36 CFR 215.2 defines an EA as “A concise public document that provides sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS) or a finding of no significant impact...” Based on the CFRs the obligation has been met by providing the proposed action for notice and comment. The Forest Service is not required to provide an analysis to the public for comment.